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July 23, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Preparation for International Telecommunication Union
World Radiocommunication Conferences, ET Docket No. 93-198

On behalf of Apple Computer, Inc., I hereby respectfully request leave to file the attached comments in the above-referenced docket. Apple Computer, Inc. was unable to file comments before July 19, 1993, the filing deadline, because it needed to analyze the impact of the Commission's recent actions in the Emerging Technology docket before it could meaningfully comment on this proceeding.

Sincerely,



Daniel S. Goldberg

DSG:bjp

cc: Damon Ladson
Office of Engineering and Technology

Attachment

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
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(3) an international allocation for unlicensed PCS will support the "PCS family" by accommodating the burgeoning wireless data applications. The accelerating growth in use of portable computing devices is creating a requirement for access to spectrum in order to enable such computers to communicate among themselves and with central data bases through wireless means. Wireless networking in hospitals, classrooms and campuses, offices and factories, is essential to working and learning today. Local wireless networking provides access to local, national and global information resources. Wireless multimedia applications will require even more bandwidth and access to spectrum throughout the world. The United States is a leader in computer networking. Providing spectrum to enable such networking to be accomplished in a wireless mode will serve to promote the continued dominance of the United States in this important industrial area.

The notion of accommodating high-data rate PCS within the concept of FPLMTS/PCS has already been established within the ITU Forum. ITU CCIR Task Group 8/1 in 1992 adopted the concept of a future phase of FPLMTS/PCS which would encompass high-data rate services. This was a significant step for a body which had previously focused primarily only on voice and very low data rate services.

As the Commission is aware, Apple Computer, Inc. has requested that the Commission allocate not 20 MHz, but 40 MHz for this important service. Internationally, WARC-92 designated the 1885-2025 MHz and 2110-2200 MHz bands for FPLMTS and PCS. No part of this spectrum was earmarked for data or user-PCS because the concept was not presented for consideration.

As the agendas for WRC-95 and WRC-97 are established this fall at WRC-93, the United States should take the lead in ensuring that a specific allocation for user-PCS can be considered at the earliest possible date. Such action is needed to provide global spectrum allocations for this important new service.

Sincerely yours,

By: /s/ James Lovette

James Lovette
Principal Scientist,
Communications Technology
Advanced Technology Group
Apple Computer, Inc.